SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP Jay B. Kasner (jay.kasner@skadden.com) Scott D. Musoff (scott.musoff@skadden.com) Four Times Square

New York, New York 10036

(212) 735-3000

Attorneys for the Underwriter Defendants

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

-----x : Master File No. 1:09-cv-01989-PAC

IN RE BARCLAYS BANK PLC SECURITIES : LITIGATION : ECF Case

LCI

This Document Relates to: All Actions : Electronically Filed

-----x

NOTICE OF MOTION OF THE UNDERWRITER DEFENDANTS TO DISMISS COUNTS I AND II OF THE CONSOLIDATED AMENDED COMPLAINT

PLEASE TAKE NOTICE that, upon the Consolidated Amended Complaint in the above-captioned action; the accompanying Memorandum of Law in Support of the Underwriter Defendants' Motion to Dismiss Counts I and II of the Consolidated Amended Complaint; and all prior papers (including those submitted by other defendants) and proceedings herein, defendants A.G. Edwards & Sons, Inc., Banc of America Securities LLC, Barclays Capital Securities Limited, BNP Paribas Securities Corp., Citigroup Global Markets Inc., Goldman, Sachs & Co., KeyBanc Capital Markets, Merrill Lynch, Pierce, Fenner & Smith Incorporated, Morgan Stanley & Co., Inc., RBC Dain Rauscher Inc., SunTrust Capital Markets, UBS Securities LLC, and Wachovia Capital Markets, LLC and Wells Fargo Securities, LLC (together, n/k/a Wells Fargo Securities, LLC) (collectively, the "Underwriter Defendants"), by and through their respective undersigned counsel, will move this Court, before the Honorable Paul A. Crotty, at the Daniel Patrick Moynihan United

States Courthouse, 500 Pearl Street, Courtroom 20C, New York, New York 10007, on a date and at a time designated by the Court, for an Order: (a) dismissing with prejudice Counts I and II of the Consolidated Amended Complaint pursuant to Rules 8(a), 9(b) and 12(b)(6) of the Federal Rules of Civil Procedure; and (b) for such other and further relief as this Court may deem just and proper.

Dated: New York, New York April 19, 2010

/s/ Jay B. Kasner
Jay B. Kasner
(jay.kasner@skadden.com)
Scott D. Musoff
(scott.musoff@skadden.com)
SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP
Four Times Square
New York, New York 10036
(212) 735-3000

Attorneys for the Underwriter Defendants

To: Samuel H. Rudman, Esq.
David A. Rosenfeld, Esq.
Mario Alba, Jr., Esq.
COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
58 South Service Road, Suite 200
Melville, NY 11747

Darren J. Robbins, Esq.
Mark Solomon, Esq.
Andrew J. Brown, Esq.
Lucas F. Olts, Esq.
Eric I. Niehaus, Esq.
COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
655 West Broadway, Suite 1900
San Diego, CA 92101

Ramzi Abadou, Esq. Erik D. Peterson, Esq. BARROWAY TOPAZ KESSLER MELTZER & CHECK, LLP 580 California Street, Suite 1750 San Francisco, CA 94104

Matthew L. Mustokoff, Esq. BARROWAY TOPAZ KESSLER MELTZER & CHECK, LLP 280 King of Prussia Road Radnor, PA 19087

Co-Lead Counsel for Plaintiffs

David H. Braff, Esq. Michael T. Tomaino, Esq. Christopher A. Perrin, Esq. SULLIVAN & CROMWELL LLP 125 Broad Street New York, NY 10004

Attorneys for the Barclays Defendants